

1 QUINN EMANUEL URQUHART & SULLIVAN, LLP

Charles K. Verhoeven (Bar No. 170151)

2 charlesverhoeven@quinnemanuel.com

David A. Perlson (Bar No. 209502)

3 davidperlson@quinnemanuel.com

Melissa Baily (Bar No. 237649)

4 melissabaily@quinnemanuel.com

John Neukom (Bar No. 275887)

5 johnneukom@quinnemanuel.com

Jordan Jaffe (Bar No. 254886)

6 jordanjaffe@quinnemanuel.com

50 California Street, 22nd Floor

7 San Francisco, California 94111-4788

Telephone: (415) 875-6600

8 Facsimile: (415) 875-6700

9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
DEFENDANTS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
EXHIBITS TO THEIR MOTION TO
COMPEL PRODUCTION OF
DOCUMENTS**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants’ Administrative Motion to File Under
7 Exhibits to Their Motion to Compel Production of Documents (the “Administrative Motion”). The
8 Administrative Motion seeks an order sealing highlighted portions of Defendant Uber Technologies,
9 Inc. and Ottomotto, LLC’s Letter Brief to Compel Production of Documents (“Uber’s Motion”) and
10 the entirety of Exhibits 5 and 6 to the Declaration of Maxwell V. Pritt.

11 3. The green highlighted portions of Uber’s Motion and the entirety of Exhibits 5 and 6
12 contain or refer to confidential business information, which Waymo seeks to seal.

13 4. Uber’s Motion (portions highlighted green) and Exhibits 5 and 6 contain, reference,
14 and/or describe Waymo’s highly confidential and sensitive business information. The information
15 Waymo seeks to seal regards the confidential analysis of Waymo’s business and competition,
16 including financial details. I understand that this confidential business information is maintained by
17 Waymo as secret. The public disclosure of this information would give Waymo’s competitors access
18 to in-depth insight into—and analysis of—Waymo’s business strategy for its autonomous vehicle
19 system. If such information were made public, I understand that Waymo’s competitive standing
20 would be significantly harmed.

21 5. Waymo’s request to seal is narrowly tailored to those portions of Uber’s Motion and
22 Exhibits 5 and 6 that merit sealing.

23 I declare under penalty of perjury under the laws of the State of California and the United
24 States of America that the foregoing is true and correct, and that this declaration was executed in San
25 Francisco, California, on July 31, 2017.

26 By /s/ Felipe Corredor

27 Felipe Corredor
28 Attorneys for WAYMO LLC

ATTESTATION

In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from Felipe Corredor.

By: /s/ Charles K. Verhoeven
Charles K. Verhoeven